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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	R.06-04-009

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AB 32 Implementation – Greenhouse Gas Emissions.	Docket 07-OIIP-01

OPENING COMMENTS OF THE ALLIANCE FOR RETAIL ENERGY MARKETS ON THE DISTRIBUTION OF EMISSIONS ALLOWANCES

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Date: October 31, 2007

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In response to the Administrative Law Judge's Ruling Requesting Comments and Noticing Workshop on Allowance Allocation Issues dated October 15, 2007 ("ALJ's Ruling"), the Alliance for Retail Energy Markets ("AReM") respectfully submits these comments.[1]

I. INTRODUCTION

AReM's comments address the issues and questions posed in the ALJ's Ruling with respect to the electricity sector only. As a threshold matter, AReM notes that because the point of regulation for greenhouse ("GHG") emissions at the national level is

[1] AReM is a California non-profit mutual benefit corporation formed by electric service providers ("ESPs") that are active in California's direct access market. The positions taken in this filing represent the views of AReM but not necessarily those of individual members or affiliates of its members with respect to the issues addressed herein.

likely to be source-based, adopting a "deliverer/first seller" approach to the regulation of GHG emissions associated with the electricity sector in California will result in a regulatory framework that, compared to a "load-based" system, will be easier to integrate with any future national regime. Therefore, it should be more efficient, less costly to consumers, and more likely to achieve the State's emission reduction goals. AReM also believes that electric service providers ("ESP") would be not be obligated entities under a deliverer/first seller approach, unless they own in-state generation units or import power from out of the state. Instead, AReM's members would be more directly affected by a load-based regulatory system, and AReM's comments therefore are focused on the issues identified and questions posed in the ALJ's Ruling as they relate to such a system.

AReM's core recommendation is that, under a load-based system, a significant percentage of the allowances set aside for the electricity sector should be made available to retail providers through an auction process so as to reduce the potential for the investor-owned utilities ("IOUs") to garner undue profits from the sale of excess allowances to other retail providers. This is a critical issue for ESPs, given that unlike the IOUs they do not have administratively set tariffed rates that allow them to pass through their regulatory compliance costs to their customers. As a result, ESPs are only assured of being able to pass through their compliance costs to the extent those costs do not cause the rates they are able to offer to customers to be higher than the IOUs' tariffed rates.

II. COMMENTS

3.1. Evaluation Criteria

Q1. Please comment on each of the criteria listed by the MAC. Are these criteria consistent with AB 32? Should other criteria be added, such as criteria specific to the electricity and/or natural gas sectors? In making trade-offs among the criteria, which criteria should receive the most weight and which the least weight?

While AReM generally supports the MAC criteria, for the reasons discussed below, some of the criteria are not applicable or relevant to the distribution of GHG emissions allowances. If a load-based system is adopted for the electricity sector, another goal, indeed a paramount goal, of the emission allowance distribution scheme should be that it does not unfairly advantage or disadvantage any class of retail providers. Under either a first seller approach or a load-based system, promoting market liquidity should also be a primary objective.

a. Reduce the cost of the program to consumers, especially low-income consumers.

GHG regulation is likely to increase costs for retail providers, and any attempt to mitigate that effect through the distribution of emissions allowances under a load-based system, particularly with respect to low-income consumers, is likely to unfairly disadvantage ESPs since they do not have administratively set rates that would allow them to pass through their full compliance costs to their customers and do not participate in ratepayer-funded programs that subsidize rates for low-income customers.[2] It therefore is critical that, under a load-based system, emissions allowances be distributed in a manner that is fair and equitable to all classes of retail providers. Moreover,

[2] While ESPs do not participate in ratepayer-funded programs that subsidize rates for low-income customers, their customers are required to fund those programs at the same levels as the IOUs' bundled customers. See P.U.Code § 368(b).

reducing the impact of GHG regulation on low-income consumers, while a laudable goal, should be achieved by other means (e.g., through the CARE program).

b. Avoid windfall profits where such profits could occur.

AReM believes that the potential for regulated entities to garner windfall profits from the sale of emissions allowances would be greater under a load-based system than a first seller approach. That is because under a load-based system, there would be a relatively less liquid market for the allowances, particularly during the initial years of the program. Another problem is that since the IOUs would be able to pass through their full compliance costs to ratepayers in tariffed rates, they may be able to invest in higher priced new technologies to achieve emissions reductions more quickly than other retail providers are therefore will be more likely to have excess allowances to sell to other retail providers. Also, the IOUs may have excess allowances due to the migration of load to direct access if the direct access market is reopened in the future. Therefore, if a load-based system is adopted, it will be critical to make a significant percentage of the allowances set aside for the electricity sector available to retail providers through an auction process so as to ensure that smaller retail providers such as ESPs are able to secure allowances without going to the secondary market where the IOUs might be able to garner windfall profits at their expense.

Under a first seller approach, regulated entities would be less likely to garner windfall profits from the sale of emissions allowances since they would be selling any excess allowances into a national market that would be much broader and therefore more liquid than a California-only retail provider market that would initially be created by a load-based system for regulating emissions in the State's electricity sector. Also, retail

providers would most likely not be able to garner windfall profits at all under a first seller approach since they would not be allocated any allowances in the first place, and any allowances they might purchase from energy producers or other regulated entities in an auction or the secondary market would be sold into the national market.

c. Promote investment in low-GHG technologies and fuel (including energy efficiency).

If a load-based system is adopted, it will be critical to ensure that the emissions allowances allocated to the IOUs administratively are not excessive since the more allowances they receive, the less incentive they will have to invest in low-GHG technologies or utilize low-GHG fuels.

d. Advance the state's broader environmental goals by ensuring that environmental benefits accrue to overburdened communities.

AReM submits that this is not an objective the State can or should attempt to address through the distribution of emissions allowances. While climate change can have local effects, there is no connection between GHG emissions from sources in a particular community and the climate effects experienced in that community. It therefore would be unproductive to attempt to address environmental issues at the local level through the allocation of GHG emissions allowances.

e. Mitigate economic dislocation caused by competition from firms in uncapped jurisdictions.

While California's economy could be disrupted by the state's regulation of GHG emissions, it is not obvious to AReM how that problem could be mitigated by the methodology for distributing GHG emissions allowances in the electricity sector. That being said, a first seller system of regulating GHG emissions in California's electricity

sector would more closely correspond with the national regulatory regime and therefore would be expected to result in less economic dislocations in the state than might occur as the result of regulation under a load-based system.

f. Avoid perverse incentives that discourage or penalize investments in low-GHG technologies and fuels (including energy efficiency).

Under either a load-based or first seller system, allowances must be distributed fairly and equitably to avoid creating disincentives for any particular entity or class of entities to reduce emissions.

g. Provide transition assistance to displaced workers.

AReM submits that this is not an objective the State can or should attempt to address through the distribution of emissions allowances.

h. Help to ensure market liquidity.

For the reasons discussed above, market liquidity is very important, and the liquidity of the secondary market would be greater under a first seller approach than a load-based system. If a load-based system is adopted, it will be critical that allowances are made available to retail sellers in a timely manner, and there should be minimum interference by regulators in the secondary market.

3.2. Basic Options

Q2. Broadly speaking, should emission allowances be auctioned or allocated administratively, or some combination?

If a load-based system is adopted, AReM recommends that allowances be distributed to retail providers using a combination of administrative allocations and auctions during the initial years of the program, and that there be a gradual transition to

an auction-only distribution system. Allocating a portion of the allowances administratively during the initial years is desirable, as it will keep compliance costs lower for all retail providers. At the same time, making allowances available to smaller retail providers through an auction process will mitigate the potential for the IOUs to exert market power, i.e., to secure excessive allowances that "new" retail providers might be forced to buy from the utilities at a premium in a relatively un-liquid market.

In addition, under either a load-based or first seller approach, AReM recommends that any allowance distribution system should set-aside a portion of allowances for use with renewable energy sales in the voluntary renewable energy market. This policy is included as an option for individual states to adopt in the Regional Greenhouse Gas Initiative ("RGGI") Model Rule Section XX-5.3(d).[3] The inclusion of a set-aside mechanism will help support California's growing voluntary renewables market, which fully complements the state's GHG emissions reduction goals through a cap and trade program.

Q3. If you recommend partial auctioning, what proportion should be auctioned? Should the percentage of auctioning change over time? If so, what factors should be used to design the transition toward more auctioning?

AReM does not have a specific recommendation as to the proportion of allowances that should be auctioned in each year. However, AReM recommends that at least 50% of the allowances set aside for the electricity sector should initially be distributed through administrative allocation, with that percentage decreasing over time as the secondary market becomes more liquid.

[3] Regional Greenhouse Gas Initiative ("RGGI") Model Rule, page 47.

Q4. How should new market entrants, such as energy service providers, community choice aggregators, or (deliverer/first seller system only) new importers, obtain emission allowances, i.e., through auctioning, administrative allocation, or some combination?

As a general rule, AReM believes that the same method should be used to distribute allowances to new entrants as is used for incumbent entities. However, during the initial years of the program, when AReM recommends a portion of allowances be allocated administratively, there should be a set-aside of allowances for new market entrants to mitigate the potential for the IOUs to exercise market power. AReM recommends that the set-aside for new market entrants correspond with the percentage of total forecast retail sales represented by new market entrants.

3.3. Auctioning of Emission Allowances—General Questions

Q5. What are the important policy considerations in the design of an auction?

AReM believes that the most important policy consideration in designing an auction process is to ensure that a sufficient quantity of allowances are made available in each auction to ensure regulated entities are able to secure the allowances they need at a reasonable price. Another very important requirement is that each auction be conducted early enough in the compliance cycle to ensure that entities will be able to secure allowances in a timely manner so that they are not forced to purchase allowances in the secondary market, particularly during the initial years of the program when the market will be less liquid. Also, if a load-based system is adopted, an independent evaluator should oversee the auction process to guard against bid inflation or the exercise of market power by the incumbent utilities that will be able to pass through the costs of the allowances they are awarded through tariffed rates. The auction process should also be

as transparent and simple as possible, and auction results (i.e., winning bids) should be made public using aggregated data.[4]

Q6. How often should emission allowances be auctioned? How does the timing and frequency of auctions relate to the determination of a mandatory compliance period, if at all?

If a load-based system is adopted, auctions should be held annually since the retail sales of competitive providers (and thus the amount of allowances they would need for compliance) can increase or decrease significantly from year to year.

Q7. How should market power concerns be addressed in auction design? If emission allowances are auctioned, how would the administrators of such a program ensure that all market participants are participating in the program and acting in good faith?

If a load-based system is adopted, then an independent evaluator should oversee the auction process and evaluate auction results to guard against price manipulation and the exercise of market power by the incumbent utilities. Also, sufficient allowances should be made available in each auction to better ensure that smaller retail providers are able to secure allowances at a reasonable price.

Q8. What criteria should be used to designate the types of expenditures that could be made with auction revenues (including use to reduce end user rates), and the distribution of money within those categories?

If a load-based approach is adopted, a portion of the auction revenues should be allocated to customers through wires charges so that all customers, including bundled and direct access customers, can have the benefit of equitable rate reductions. The remaining revenues should go into a fund administered by an appropriate state government entity or an independent, third-party administrator to be dedicated to GHG reductions and the development of low-GHG technologies.

[4] The bid-specific data of competitive retail providers such as ESPs should be confidential.

Q9. What type of administrative structure should be used for the auction? Should the auction be run by the State or some other independent entity, such as the nonprofit organization being established by the Regional Greenhouse Gas Initiative?

If a load-based system is adopted, auctions of allowances to retail providers should be administered by an independent evaluator.

3.4. Electricity Sector

3.4.1. Administrative Allocation of Emission Allowances

Various methods have been proposed and discussed for the administrative allocation of emission allowances. The following potential methods could be used:

a. **Grandfathering: "A method by which emission allowances are freely distributed to entities covered under an emissions trading program based on historic emissions." (MAC report, p. 93.)**

b. **Benchmarking: "An allowance allocation method in which allowances are distributed by setting a level of permitted emissions per unit of input or output" (e.g., fuel used or sales to customers (pounds (lbs)/megawatt-hour or lbs/million British thermal units (MMBtu)). (MAC report, p. 90.)**

c. **Updating: "A form of allowance allocation in which allocations are reviewed and changed over time and/or awarded on the basis of changing circumstances (such as output) rather than historical data (such as emissions, input or output). For example, allowances might be distributed based on megawatt-hours generated or tons of a product manufactured." (MAC report, p. 96.)**

d. **Other: Such as population (lbs of carbon dioxide (CO2)/customer or lbs CO2/capita), or cost of compliance (based on retail provider supply curves of emission reduction measures, or a comparable metric).**

Q10. If some or all allowances are allocated administratively, which of the above method or methods should be used for the initial allocations? If you prefer an option other than one of those listed above, describe your preferred method in detail. In addition to your recommendation, comment on the pros and cons of each method listed above, especially regarding the impact on market performance, prices, costs to customers, distributional consequences, and effect on new entrants.

If a load-based system is adopted, AReM recommends that administrative allocations be based on the proposed "Updating" method, with allocations being based on the percentage of forecast total annual retail sales represented by each retail providers. Basing allocations on retail sales will ensure that the allocations are equitable for all classes of retail providers, and annual updates are appropriate given that individual ESPs and other competitive providers, unlike the IOUs, can experience significant increases or decreases in their sales from year to year. Under any of the other methods, the IOUs would most likely be unfairly advantaged and other retail providers, particularly ESPs, community choice aggregators and other new market entrants, would be unfairly disadvantaged.

Q11. Should the method for allocating emission allowances remain consistent from one year to the next, or should it change as the program is implemented?

As a general rule, the method for allocating emission allowance (i.e., updating) should remain constant from year to year to provide regulatory certainty for obligated entities. However, there should be the provision for the method to be adjusted as needed to address changed circumstances or new considerations that may arise.

Q12. If new market entrants receive emission allowance allocations, how would the proper level of allocations be determined for them?

Please see AReM's response to Question 10 above.

Q13. If emission allowances are allocated based on load/sales, population, or other factors that change over time, how often should the allowance allocations be updated?

Please see AReM's response to Question 10 above.

Q14. If emission allowances are allocated based on historical emissions "grandfathering") or benchmarking, what base year(s) should be used as the basis for those allocations?

Basing allocations on historical emissions would be inequitable for ESPs. If this method was adopted, however, basing allocations on each retail provider's emissions in the year prior to the compliance year would be the least unfair. Moreover, if this approach was adopted, it would be important to use the same methodology for calculating each retail provider's allocations as is used for calculating each retail provider's emissions reduction obligation for each compliance period. For example, if a retail provider's emissions reduction obligation during the compliance period is determined based on that provider's electricity procurement, then the procurement amount should also be used to determine the provider's allowance allocations.

Q15. If emission allowances are allocated based initially on historical emissions ("grandfathering"), should the importance of historical emissions in the calculation of allowances be reduced in subsequent years as providers respond to the need to reduce GHGs? If so, how should this be accomplished? By 2020, should all allocations be independent of pre-2012 historical emissions?

The historical emissions allocation method, if adopted, should transition to the updating method as quickly as possible to minimize the disadvantage to non-IOU retail providers.

Q16. Should a two-track system be created, with different emission allowances for deliverers/first sellers or retail providers with legacy coal-fueled power plants or legacy coal contracts? What are the factors and trade-offs in making this decision? How would the two tracks be determined, e.g., using an historical system emissions factor as the cut-off? How should the allocations differ between the tracks, both initially and over time? What would be the market impact and cost consequences to consumers if a two-track method were used?

As a general rule, the same allocation method should be used for ESPs as is used for the IOUs. However, it would be reasonable to have a set-aside of allowances for new market entrants, at least for the initial years of the program, which corresponds with the percentage of forecast total annual retail sales represented by such entities.

Q17. If emission allowances are allocated administratively to retail providers, should other adjustments be made to reflect a retail provider's unique circumstances? Comment on the following examples, and add others as appropriate:

Please see AReM's response to Question 16 above.

a. Climate zone weighting to account for higher energy use by customers in inclement climates, and

Administrative allocations to retail providers should not be adjusted to account for higher energy use by customers in different climate zones, as that would most likely unfairly disadvantage ESPs, given that ESPs, unlike the IOUs who have defined service territories, typically serve load throughout the entire state. Instead, this issue should be addressed through utility ratemaking.

b. Increased emission allowances if there is a greater-than-average proportion of economically disadvantaged customers in a retail provider's area.

This is also an issue that should be addressed through utility ratemaking, not the allocation of allowances. Also, as noted previously, impacts on low-income consumers should be addressed through other means (e.g., the CARE program).

Q18. Should differing levels of regulatory mandates among retail providers (e.g., for renewable portfolio standards, energy efficiency investment, etc.) be taken into account in determining entity-specific emission allowance allocations going forward? For example, should emission allowance allocations be adjusted for retail providers with high historical investments in energy efficiency or renewables due to regulatory mandates? If those differential mandates persist in the future, should they continue to affect emission allowance allocations?

ESPs are subject to the same RPS and resource adequacy requirements as the IOUs. Adjusting allowances for historical investments in energy efficiency does not make sense and in any event could unfairly advantage the IOUs. AReM notes further that this issue would not arise under a first-seller approach.

Q19. How often should the allowance allocation process occur? How far in advance of the compliance period?

Allocations should be done annually, given that the compliance requirements for ESPs and other competitive providers can change significantly from year to year. Also, the allocations should be distributed well in advance of the compliance period so that retail providers will know well in advance the amount of allowances they will need to secure through the auction or secondary market.

Q20. What are the distributional consequences of your recommended emission allowance allocation approach? For example, how would your method affect customers of retail providers with widely differing average emission rates? Or differing rates of population growth?

Please see above responses.

3.4.2. Emission Allowances with a Deliverer/First Seller Point of Regulation

Since ESPs would typically not be directly impacted by the regulation of GHG emissions under a first seller approach, AReM reserves comment on issues specific to distribution of allowances under the same.

Q21. Would a deliverer/first seller point of regulation necessitate auctioning of emission allowances to the deliverers/first sellers?

Comment reserved.

Q22. Are there interstate commerce concerns if auction proceeds are obtained from all deliverers/first sellers and spent solely for the benefit of California ratepayers? If there are legal considerations, include a detailed analysis and appropriate legal citations.

Comment reserved.

Q23. If you believe 100% auctioning to deliverers/first sellers is not required, explain how emission allowances would be allocated to deliverers/first sellers. In doing so, answer the following:

a. How would the amount of emission allowances given to deliverers/first sellers be determined during any particular compliance period?

Comment reserved.

b. How would importers that are marketers be treated, e.g., would they receive emission allowance allocations or be required to purchase all their needed emission allowances through auctions? If allocated, using what method?

Comment reserved.

c. How would electric service providers be treated?

Since ESPs in California typically do not own generation resources at this time, they typically would not be regulated under a first seller approach. To the extent an ESP would be subject to regulation, AReM's comments on the distribution of allowances under a load-based system would generally be applicable.

d. How would new deliverers/first sellers obtain emission allowances?

Please see AReM's response to Question 23(c).

e. Would zero-carbon generators receive emission allowance allocations?

Comment reserved.

f. What would be the impact on market performance, prices, and costs to customers of allocating emission allowances to deliverers/first sellers?

Comment reserved.

g. What would be the likelihood of windfall profits if some or all emission allowances are allocated to deliverers/first sellers?

Comment reserved.

h. How could such a system prevent windfall profits?

Comment reserved.

Q24. With a deliverer/first seller point of regulation, should administrative allocations of emission allowances be made to retail providers for subsequent auctioning to deliverers/first sellers? If so, using what allocation method? Refer to your answers in Section 3.4.1., as appropriate.

AReM does not support the allocation of allowances under the deliverer/first seller point of regulation to the IOU retail providers for subsequent auctioning to deliverers/first sellers for the following reasons:

(1) Under a deliverer/first seller approach, the IOUs would be included under the definition of first seller because they own in-state emitting resources; this creates an inherent conflict of interest as the IOUs would seek to sell their allocations at the highest price while at the same time they would seek to purchase allowances at the lowest price for their owned and/or controlled generation units; and

(2) The inherent conflict of interest that would arise if the IOUs are provided with administrative allocations under a deliverer/first seller point of regulation would also place ESPs at a disadvantage because the IOUs' competing goals of selling high and buying low would unfairly lower their compliance costs vis a vis the ESPs who would not be similarly situated.

Q25. If you recommend allocation of emission allowances to retail providers followed by an auction to deliverers/first sellers, how would such an auction be administered? What kinds of issues would such a system raise? What would be the impact on market performance, prices, and costs to customers?

Please see AReM's response to Question 24.

3.5. Natural Gas Sector

Q26. Answer each of the questions in Section 3.4.1. except Q16, but for the natural gas sector and with reference to natural gas distribution companies investor- or publicly-owned), interstate pipeline companies, or natural gas storage companies as appropriate. Explain if your answer differs among these types of natural gas entities. Explain any differences between your answers for the electricity sector and the natural gas sector.

Comment reserved.

Q27. Are there any other factors unique to the natural gas sector that have not been captured in the questions above? If so, describe the issues and your recommendations.

Comment reserved.

3.6. Overall Recommendation

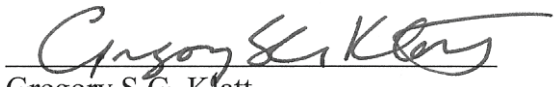
Q28. Considering your responses above, summarize your primary recommendation for how the State should design a system whereby electricity and natural gas entities obtain emission allowances if a cap and trade system is adopted.

If a load-based system is adopted, at least 50% of allowances should be allocated administratively, with a set-aside of allowances for ESPs and other "new" retail providers, during the initial years of the program, market entrants. At the same time, a significant percentage of the allowances established for the electricity sector should be made available to retail providers in general and smaller providers in particular through an auction process, with a gradual transition to a 100% auction-based distribution system as the secondary market becomes more liquid.

III. CONCLUSION

For the foregoing reasons, AReM urges the adoption of the recommendations set forth in these comments. AReM looks forward to participating in the upcoming workshop (or workshops), where the issues and recommendations can be examined more closely.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **Opening Comments Of The Alliance For Retail Energy Markets On The Distribution Of Emissions Allowances** on all parties of record in proceeding **R.06-04-009** by serving an electronic copy on their email addresses of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on October 31, 2007, at Woodland Hills, California.

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